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***Via E-Mail***

June 20, 2007

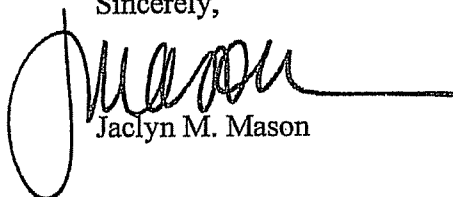
Annie Rogaski, Esquire  
Townsend and Townsend and Crew LLP  
379 Lytton Avenue  
Palo Alto, CA 94301

Re: *Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC v. Baxter International Inc. and Baxter Healthcare Corp.*, No. 05-CV-349 (GMS) (D. Del.)

Dear Annie:

Enclosed please find a notice of deposition for Mr. Guiheen, pending our review of the summary of his expected trial testimony, which we have yet to receive. We are providing this as a courtesy given that our Local Rules require five days notice for the taking of depositions. See D. Del. LR. 30.1.

Sincerely,



Jaclyn M. Mason

Enclosure

cc: Jeffrey B. Bove, Esq. (via email)  
Philip Rovner, Esq. (via email and hand delivery)

546005

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TALECRIS BIOTHERAPEUTICS, INC., and )  
BAYER HEALTHCARE LLC, )

Plaintiffs, )

v. )

BAXTER INTERNATIONAL INC., and )  
BAXTER HEALTHCARE CORPORATION, )

Defendants. )

C.A. No. 05-349-GMS

Jury Trial Demanded

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BAXTER HEALTHCARE CORPORATION, )

Counterclaimant, )

v. )

TALECRIS BIOTHERAPEUTICS, INC., and )  
BAYER HEALTHCARE LLC, )

Counterdefendants. )

**PLAINTIFFS' NOTICE OF DEPOSITION OF LAWRENCE GUIHEEN**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that beginning on June 27, 2007 at 9:30 a.m., at the offices of Connolly Bove Lodge and Hutz LLP, 1007 N. Orange Street, Wilmington, Delaware, 19801, counsel for Plaintiffs Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC will take, pursuant to Federal Rules of Civil Procedure 28 and 30, the deposition upon oral examination of Lawrence Guiheen.

The deposition will be taken before an officer authorized to administer oaths and will continue from hour to hour and day to day until completed. You are invited to attend and cross-examine.

Please be advised that this deposition may be recorded by videotape in addition to stenographic recording, which will include the use of LiveNote real time transcription.

Date: June 20, 2007

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Jeffrey B. Bove  
Jeffrey B. Bove (#998)  
Mary W. Bourke (#2356)  
Mark E. Freeman (#4257)  
Jaclyn M. Mason (#4737)  
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*Attorneys for Bayer Healthcare LLC*

**CERTIFICATE OF SERVICE**

I, Jeffrey B. Bove, hereby certify on this 20<sup>th</sup> day of June, 2007, I electronically filed the foregoing **PLAINTIFFS' NOTICE OF DEPOSITION OF LAWRENCE GUIHEEN** with the Clerk of Court using CM/ECF which will send notification of such filing to the following:

Philip A. Rovner, Esquire Potter Anderson & Corroon LLP Hercules Plaza P. O. Box 951 Wilmington, DE 19899 (302) 984-6140 <a href="mailto:provner@potteranderson.com">provner@potteranderson.com</a>	Susan Spaeth, Esquire Townsend and Townsend and Crew LLP 379 Lytton Avenue Palo Alto, CA 94301-1431 (415) 576-0200 <a href="mailto:smspaeth@townsend.com">smspaeth@townsend.com</a>
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/s/ Jeffrey B. Bove

**Jeffrey B. Bove (#998)**

**Mary W. Bourke (#2356)**

**Mark E. Freeman (#4257)**

**Jaclyn M. Mason (#4737)**

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